

**Waste and Chemicals Management Division**

***Fiscal Years 1999/2000  
Two-Year Plan***

***Ecological Protection***

**March 31, 1999**

***Human Health Protection***

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## Our Vision

The Waste and Chemicals Management Division is responsible for the effective administration of six environmental statutes that provide for the protection of our air, water and land environments as well as our right to know about chemicals in our environment. We must ensure that the public is protected through our enforcement authorities and voluntary programs and informed through our right-to-know authorities.

**Our common goal is to prevent pollution transfer from one media to another and to strive toward reduction or elimination of environmental contamination.**

Our multiple statutory authorities enable us to administer our enforcement and program responsibilities cumulatively, addressing many different sources of pollution in a single area. WCMD statutes include provisions to protect our air from particulate asbestos emissions, to protect our water and land from inefficient hazardous waste practices and pesticide misuse or runoff, and to protect our children from the hazards of lead-based paint and other environmental contaminants. Our statutory responsibilities also include ensuring that environmental information is complete and of good quality so that individuals who reside in Region III can formulate risk-based decisions about their home, school and work environments.

Our authorities primarily affect businesses and individuals who impact our environment. This focus necessarily leads us to our cities and urban environments since the industrial practices regulated under our six statutes are largely situated in urban, highly populated areas. The focus on large populations further enables us to manage environmental justice issues in conjunction with our other environmental authorities. Within our cities and urban environments and elsewhere, we continue to assist our regulated community with education and incentives to reduce or eliminate environmental contamination.

The cumulative approach to environmental protection primarily supports two Regional goals: the protection of our cities and urban environments and protection of the Chesapeake Bay and other estuaries. Our human resources provide the means for achieving our goals and objectives and we will manage our organization with keen regard for the maintenance and development of our people. Together with our state and local government partners, the regulated community, and the public we can achieve a measurable improvement in the quality of our environment.

## Introduction

This report describes the measures and milestones that the Waste and Chemicals Management Division will use to evaluate the success of our programs during FY99. Each measure is related to a specific goal outlined by the Government Performance and Results Act (GPRA). Implementation plans that describe the Division's specific activities to support the measures are included in Appendix I. Contained in Appendix II are the Division's response to special Agency initiatives, including Children's Health, Environmental Justice and Customer Service.

Our Division's agreements with Headquarters offices are included in Appendix III. These agreements include OSWER's Beginning Year Plan (BYP), Regional Strategic Overview for Underground Storage Tanks (UST) and the Memoranda of Agreement (MOA) between the Division and OPPTS and OECA. Descriptions of each document and our current year commitments are included below.

In support of our Agency's goal to establish a management infrastructure to facilitate the highest quality standards for effective management through vision and leadership, WCMD programs have an integral role in the establishment of Environmental Performance Partnership Agreements (EnPA) with our States. Currently, WCMD programs are actively participating in achieving the goals set forth in the EnPA with the State of Delaware and in the development of the workplan for the recently signed EnPA with the State of Maryland.

**OSWER BYP:** The Beginning of Year Plan (BYP) is an annual planning tool that Region III uses to plan all program commitments for the fiscal year as well as the longer term commitments. This planning process also provides an opportunity for communication and feedback between Region III and Headquarters. The FY 1999 BYP provides Headquarters with the information it needs to understand the unique approaches and challenges of the Regions. In addition, the BYP gives the Regions a chance to express policy concerns and to influence the direction of the RCRA program.

The GPRA requires a longer-term planning process. Therefore the BYP also reflects long term RCRA State Authorization goals and the Permitting and Corrective Action sections are based on a three year time frame. This year, the BYP will rely heavily on the RCRIS database for baseline information concerning RCRA Subtitle C implementation. The purpose of this change is to encourage more accurate RCRIS information and to shift the focus of the BYP discussions between the Regions and Headquarters from data-related issues to more substantive policy discussions. The FY1999 BYP is included in Appendix III.

**OPPTS MOA:** OPPTS continues to seek the highest possible risk reduction through the integration of pollution prevention into core programs and application of multi-media activities to specific geographic and community-based initiatives. The core areas for focus during FY98/99 include emphasis on state authorization of accreditation and certification training programs for lead-based paint and public outreach to ensure smooth implementation of TSCA §1018 Real Estate Notification and Disclosure rule, EPCRA compliance assistance, promotion of TRI Data Use, pesticide worker protection, pesticide groundwater protection, urban pesticide use and implementation of Integrated Pest Management (IPM) strategies are focal points. Through our association with OPPTS, the WCMD continues to contribute to the successful achievement of GPRA Goals #2, Clean and Safe

Water, #3 Safe Food, #4 Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems, and #7 Expansion of American's Right to Know about their Environment.

**OECA MOA:** OECA programs are designed to address significant environmental and non-compliance problems, using a variety of enforcement and compliance tools. The OECA programs are designed to support the GPRA Goal #9: Credible Deterrent to Pollution and Greater Compliance with the Law. The objectives of Goal #9 are to identify and reduce significant noncompliance through enforcement presence and to promote voluntary compliance with the law within the regulated community. The FY1998/1999 OECA MOA is organized around four themes:

**Community-based protection:** Effective analysis of data and screening strategies ensure that the highest priority communities, ecosystems and places are selected based on the highest risk, disproportionately exposed populations and noncompliance. WCMD is committed to supporting continuing Regional projects in the Anacostia River (DC), Chester (PA), and the Kanawha Valley (WV) through administration of RCRA Subtitle C and I, FIFRA, EPCRA and TSCA authorities.

**Industry sectors:** From FY97- FY99, 10 sectors have been identified to be enforcement priorities for the nation. WCMD is committed to inspection activity in five areas administered by WCMD programs. They include petroleum refining, primary nonferrous metals, iron and steel, drycleaners and industrial organic chemicals and chemical preparation. WCMD commitments include sector specific inspections as well as participation in multi-media inspections.

**Media-specific:** OECA has also approached significant noncompliance from a media specific perspective. WCMD supports OECA's priorities for FY97/98 and the new FY98/99 priorities including enhanced enforcement and compliance assistance activity for TSCA section 1018, lead-based paint notification and disclosure requirements and for RCRA Subtitle I (underground storage tanks) as the 12/22/98 upgrade, replace or close requirements deadline arrives.

**Cross-cutting issues:** WCMD continues to pursue the use of imminent and substantial endangerment actions where appropriate.

**Regional Strategic Overview (RSO) for Underground Storage Tanks (UST):** The RSO presents the regional strategic plan for working with states on national RCRA-UST priorities, including near-term needs such as promoting the December 1998 UST compliance deadline, Risk-Based Corrective Action (RBCA) implementation for leaking underground storage tanks, and State Program Approval, as well as longer-term challenges involved in assuring that good tank management becomes common practice.

The strategic analysis and planning involved in the RSO process will assist Region III in meeting the GPRA goals of reducing releases and expeditiously cleaning up those releases that do occur. The RSO is planned for two-year cycles including the preparation of a written document submitted to EPA Headquarters, Office of Underground Storage Tanks (OUST). During the first year of the cycle (FY1998), OUST will visit the Region (September/October) to discuss the written RSO and to provide comments/suggestions. On the second year of the RSO cycle (FY1999), OUST

will visit the Region (September/October) to discuss results from the previous year and to further carry-out this strategic planning exercise. The result of these meetings are contained in the RSO Update, included in Appendix III.

**Environmental Performance Partnership Agreements (EnPA):** EPA Region III has entered into EnPAs with two of the Region III States. The EnPAs with the Maryland Department of the Environment (MDE) and the Delaware Department of Natural Resources and Environmental Control (DNREC) represent the evolving relationship between the Federal government and the States. WCMD is committed to working within the National Environmental Performance Partnership System (NEPPS) to continue improving the two currently existing EnPAs as well as to develop partnerships with additional States. The EnPAs address strategic priorities, continuing improvements, compliance assistance and enforcement, oversight reform, interagency communication and public participation. WCMD's goal is to ensure that both EPA and the States are doing the appropriate activities to ensure protection of public health and the environment. By continuing to participate in the development of EnPAs, the Division will continue to assess the impact of its actions on the environment and redirect efforts as necessary to achieve the greatest positive influence on the environment.

The EnPA has promoted communication and understanding in the development of environmental indicators and establishing common goals. The WCMD is committed to supporting the themes that include enhanced enforcement communication and accountability, data sharing and opportunities for increased investment in common priorities and reduced reporting and oversight.

**Regional Priorities:** The Waste and Chemicals Management Division is actively participating on all of the 5 Regional Priorities, emphasizing Cities and Urban Environments and the Chesapeake Bay and other Estuaries. This special emphasis is reflected in each of the following GPRA goal descriptions for our organization with references such as agricultural pesticide runoff and urban pesticide use, waste management, state relations and compliance assistance for the regulated community subject to our multiple statutory authorities. The development of the WCMD Children's Health Initiative (see Appendix II) and the establishment of an enforcement team in the Wheeling Field Office to enhance our enforcement presence in the western cities and urban environments of our Region further underscores our special focus on this regional priority.

## **WCMD FY99 Performance Measures and Milestones**

### **Goal #1: Clean Air**

#### **GPRA Objectives: By 2010,**

- 1.2. Reduce air toxic emissions by 75% from 1993 levels to significantly reduce the risk to Americans of cancer and other serious adverse health effects caused by airborne toxics.\*

#### **FY99 Performance Measures and Milestones**

\* The Waste and Chemicals Management Division's role in support of Goal #1: Clean Air are expressed through administration of the asbestos Clean Air Act (CAA) NESHAP and the RCRA combustion program. The objectives related to the asbestos CAA - NESHAP are listed under Goal #4: Pollution Prevention on page 9. The RCRA objectives, including the combustion component are listed under Goal #5: Better Waste Management on page 10.

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### **Goal #2: Clean and Safe Water:**

#### **GPRA Objectives: By 2005,**

- 2.1. Protect human health so that 95% of the population served by community water systems will receive water that meets drinking water standards.\*
- 2.2. Conserve and enhance the ecological health of the nation's waters and aquatic ecosystems -- rivers and streams, lakes, wetlands, estuaries, coastal areas, oceans, and groundwater -- so that 75% of waters will support healthy aquatic communities.\*

#### **FY99 Performance Measures and Milestones**

\* WCMD performance measures to protect ecosystems and drinking water are expressed by prevention of pesticide leachate to groundwater and improved pesticide management practices within the Chesapeake Bay Basin (See Goal #4: Preventing Pollution, page 9) and preventing groundwater releases from contaminated waste sites (See Goal #5: Better Waste Management, page 10).

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### **Goal # 3: Safe Food**

#### **GPRA Objectives: By 2005,**

- 3.1. Reduce by 50% the risk from agricultural use of pesticides from 1995 levels.

- 3.2. Substantially eliminate current use of pesticides on foods that do not meet the statutory standard of reasonable certainty of no harm.

#### **FY 99 Performance Measures and Milestones:**

Region III will work cooperatively, through the performance partnership grants, with states to:

- Collect data of good quality on pesticide usage, in order to track/assess pesticide usage trends in the Region.
- Implement farm-gate sampling program to evaluate the ratio of violative crop residue samples to total crop samples collected.
- Certify 3000 applicators and recertify 20,000 applicators (projected) by the end of the fiscal year.
- Update/approve state Certification & Training Plans.
- Update Certification & Training materials to include FQPA information.
- Reduce the number of pesticide misuse incidents involving food crops.
- Reduce pesticide poisoning incidents.

#### **Integration with other Regional Priorities:**

WCMD will actively participate in the Region III Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for safe food in the following areas:

- **Chesapeake Bay and other Estuaries**, particularly those areas involving runoff, pesticides, toxic substances, and growth/sustainable development.
- **Cities/Urban Environment**, particularly in the areas of pesticides, environmental justice, children's health protection, drinking water, and land use.

#### **Program Leads:**

- Donald Lott, Chief, Pesticides/Asbestos Programs and Enforcement Branch, 3WC32, 215-814-2041
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169

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## **Goal #4: Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems:**

### **GPRA Objectives: By 2005,**

- 4.1. Reduce public and ecosystem exposure to pesticides through migration to lower risk pesticides and pest management practices.
- 4.2. Increase the number of Americans living in homes schools or buildings with healthier indoor air.
- 4.3. Significantly reduce lead poisoning levels with emphasis on children in high risk groups.
- 4.4. Reduce by 25% (from 1992 level) the quantity of toxic pollutants released, disposed of, treated or combusted for energy recovery.
- 4.5. Increase recycling and decrease the quantity and toxicity of waste generated.

### **FY99 Performance Measures and Milestones**

- Identify high priority PBT generators, conduct site visits/contacts at 125 facilities and assist in developing and implementing 40 facility Waste Minimization plans.
- Implement TRI source reduction activities.
- State authorizations or regulatory revisions will be authorized/approved. Award and oversee FY 99 TSCA AHERA, 404(g), FIFRA and CAA 105 grants\*.
- Provide oversight to states during the authorization process for lead programs.
- Support implementation of Pesticide Urban Initiative programs in all Region III states.
- Assess effectiveness of FIFRA Worker Protection SIP's and make recommendations, as may be needed.
- Establish IPM tracking mechanisms through cooperative efforts with the Chesapeake Bay Program Office and signatory states.\*\*
- Encourage and support efforts to develop and submit State Management Plans to prevent pesticide leachate to groundwater (contingent upon issuance of Pesticide in Ground Water Rule).\*\*
- Promote IPM implementation and pesticide collection/disposal/container recycling programs through the State pesticide grant programs.\*\*
- Encourage States to divert MSW from landfilling and combustion to recycling and reduce the amount of MSW generated.

- Support State and local solid waste recycling and waste minimization programs to reduce per capita generation to 4.3 pounds per day.

### **Integration with other Regional Priorities**

WCMD will actively participate in the Region III Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for pollution prevention in the following areas:

- **Cities/Urban Environment** particularly in the area of pesticide management and disposal in the Bay area, children's health protection and source reduction for PBT constituents, including lead.
- **Chesapeake Bay and Other Estuaries** particularly involving pesticide management as it relates to Children's Health and the Pesticide Urban Initiative and source reduction for PBT constituents, including pesticides.

### **Program Leads:**

- Wayne Naylor, Chief, Technical and Program Support Branch, 3WC11, 215-814-3385
- Aquanetta Dickens, Chief, Toxics Programs and Enforcement Branch, 3WC33, 215-814-2080
- John Humphries, Chief, State Programs Branch, 3WC21, 215-814-3372
- Don Lott, Chief, Pesticides/Asbestos Programs and Enforcement Branch, 3WC32, 215-814-3244
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169
- Maria Vickers, Associate Director, Office of RCRA Programs, 3WC10, 215-814-3149

\* WCMD support of Goal #1: Clean Air

\*\*WCMD support of Goal #2: Clean and Safe Water. The States expect to implement a mechanism for measuring risk reduction resulting from implementation of IPM practices on agricultural, recreational and public lands within the Chesapeake Bay basin by the year 2000.

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### **Goal #5: Better Waste Management and Restoration of Contaminated Waste Sites**

#### **GPRA Objectives: By 2005,**

- 5.2. Over 282,000 facilities will be managed according to the practices that prevent releases to the environment and EPA and its partners will have the capabilities to successfully respond to all known emergencies to reduce the risk to human health and the environment.

5.2.4. and 5.2.5. and 5.2.8. Manage all treatment, storage, disposal, and combustion facilities\* such that approved controls are in place to prevent dangerous releases to air, soil

or groundwater.

5.2.4.1. Hazardous waste controls in place

5.2.4.2. Authorize capable state programs to assist EPA as full partners in implementation of Hazardous Waste, Underground Storage Tank, and Solid Waste Programs.

5.2.5. Combustion facility controls in place

5.2.8. MSW controls in place

### **FY99 Performance Measures and Milestones**

- 20% (60) of high priority RCRA facilities will have human exposures controlled.
- 15% (45) of high priority RCRA facilities will have groundwater releases controlled.\*\*
- 62% of existing hazardous waste management facilities (based on the universe baseline from 1996) will have been issued a RCRA operating permit.
- 50% of commercial combustion facilities\* will be operating under a full RCRA permit.
- 100% of TSD permits, combustion permits\*, risk assessments for commercial hazardous waste combustion facilities\*, and corrective action remedies will be done with full public participation.
- State authorizations or regulatory revisions will be authorized/approved.
- Complete cleanups at leaking underground storage tank sites.
- Upgrade underground storage tanks and piping systems to meet EPA/State requirements.
- Promote state permitting of MSW facilities to have approved controls in place that prevent releases to the environment.

### **Integration with other Regional Priorities**

WCMD will actively participate in the Region 3 Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for better waste management in the following areas:

- **Chesapeake Bay and Other Estuaries** particularly in fostering partnerships with

regard to public participation grants with Delaware (Delaware Estuary), evaluating impacts of groundwater pumping on public water supplies in Baltimore and corrective action targeting

- **Cities/Urban Environment** particularly in the area of children's health, environmental justice, industry sector and brownfields initiatives and remedial activities in the Anacostia region.

**Program Leads:**

- Robert Greaves, Chief, RCRA Operations Branch, 3WC23, 215-814-3423
- Paul Gotthold, Chief, PA Operations Branch, 3WC22, 215-814-3410
- John Humphries, Chief, State Programs Branch, 3WC21, 215-814-3372
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169
- Maria Vickers, Associate Director, Office of RCRA Programs, 3WC10, 215-814-3149

\* WCMD support of Goal #1: Clean Air

\*\*WCMD support of Goal #2: Clean and Safe Water

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**Goal # 6: Reduction of Global and Cross-Border Environmental Risks:**

**GPRA Objectives: By 2005,**

- 6.4. Reduce the risks to U.S. public health and ecosystems from selected toxics that circulate in the environment at global and regional scales consistent with international obligations.
- 6.5. Increase the application of cleaner and more cost-effective environmental practices and technologies in the U.S. and abroad through international cooperation.

**FY 99 Performance Measures and Milestones:**

- Refer 10 import and 4 export referrals to the States to conduct compliance monitoring inspections.
- Assess compliance rates involving import and export violations, and incidents involving use of improperly imported pesticides products.
- Develop an electronic file system for import notifications.
- Conduct international outreach to exchange technical and pesticide regulatory information.

**Interaction with other Regional Priorities**

WCMD will actively participate in the Region III Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for global and cross border risk in the following areas:

- **Cities/Urban Environments** particularly in the area of pesticide use in agricultural food products.

**Program Leads:**

- Donald Lott, Chief, Pesticides/Asbestos Programs and Enforcement Branch, 3WC32, 215-814-2041
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169

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**Goal #7: Expansion of American's Right-to-Know about their Environment**

**GPRA Objectives: By 2005,**

- 7.1. EPA will improve the ability of the American public to participate in the protection of human health and the environment by increasing the quality and quantity of general environmental education, outreach and data availability programs, especially in disproportionately impacted and disadvantaged communities.
- 7.2. Improve the ability of the public to reduce exposures and health risks by making current, accurate chemical information widely and easily accessible.

**FY99 Performance Measures and Milestones**

- Achieve 95% public customer satisfaction with regard to FOIA requests.
- Provide opportunities to increase awareness about environmental chemicals, chemical waste streams and chemical safety among stakeholders and other interest groups through seminars, outreach programs, conferences, educational exhibits, workshops and compliance monitoring.
- Effectively communicate new scientific applications and developments in formats accessible to a variety of audiences and users.
- Establish a mechanism for States to use targeting information as part of the TRI annual reporting cycle.
- Encourage and facilitate TRI data use.
- Promote IPM education through pesticide certification and training programs and by inclusion in Ground Water State Management Plans of all Region III states.
- Improve community awareness by providing opportunities for citizen participation at

critical decision points in the clean up and permit process and by improving access to EPA data and program information.

### **Integration with other Regional Priorities**

WCMD will actively participate in the Region III Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for Right-To-Know in the following areas:

- **Cities/Urban Environment** particularly in the area of environmental justice, children's health, the 600+ TRI chemicals including lead, asbestos and pesticides and chemicals listed as persistent, bioaccumulative and toxic (PBT).

### **Program Leads**

- Don Lott, Chief, Pesticides/Asbestos Programs and Enforcement Branch, 3WC32, 215-814-2041
- Aquanetta Dickens, Chief, Toxic Programs and Enforcement Branch, 3WC33, 215-814-2080
- Wayne Naylor, Chief, Technical and Program Support Branch, 3WC11 215-814-3385
- John Humphries, Chief, State Programs Branch, 3WC21, 215-814-3372
- Paul Gotthold, Chief, PA Operations Branch, 3WC22, 215-814-3410
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169
- Maria Vickers, Associate Director, Office of RCRA Programs, 3WC10, 215-814-3149

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### **Goal #8: Sound Science, Improved Understanding of Environmental Risk, and Greater Innovation to Address Environmental Problems**

#### **GPRA Objectives: By 2005,**

- 8.8. Regions will have demonstrated capability to assess environmental conditions in their Region, compare the relative risk of health and ecological problems, and assess the environmental effectiveness of management action in priority geographic areas.

### **FY99 Performance Measures and Milestones**

- Improve quality of scientific activities through peer review as opportunities arise.
- Improve relevance of scientific activities through the application of new techniques to enforcement and program activities as opportunities arise.
- Coordinate with other Agency Offices (ORD, HQ and Regions), the regulated community and academia in developing, consolidating and implementing risk-based targeting approaches, waste stream process modifications and innovative technologies for RCRA corrective action.

## **Integration with other Regional Priorities**

WCMD will actively participate in the Region III Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for sound science in the following areas:

- **Cities/Urban Environment** particularly in the area of environmental justice, children's health and efforts to express cumulative risk, that is to evaluate impacts of multiple sources, chemicals and pathways in a cumulative manner.

### **Program Leads:**

- Debra Forman, Senior Technical Advisor, Immediate Office, 3WC00, 215-814-2073
- Wayne Naylor, Chief, Technical and Program Support Branch, 3WC11, 215-814-3385
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169
- Maria Vickers, Associate Director, Office of RCRA Programs, 3WC10, 215-814-3149

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### **Goal # 9: A Credible Deterrent to Pollution and Greater Compliance with the Law:**

#### **GPRA Objectives: By 2005,**

- 9.1. Identify and reduce significant non-compliance in the RCRA, FIFRA, TSCA, CAA, and EPCRA program areas, while maintaining a strong enforcement presence in all states and regulatory program areas.
- 9.2. Promote the regulated communities' voluntary compliance with requirements through compliance and assistance activities.

#### **FY 99 Measures and Milestones:**

- Identify and reduce significant non-compliance in high priority program areas.
- 50% of the Division's compliance monitoring and inspections are conducted at high risk, or disproportionately exposed communities and other priority areas of non-compliance.
- 30 compliance assistance activities to improve the regulated community's understanding of environmental requirements.
- Engage in capacity building activities conducted for the States and WCMD staff to improve the implementation of the regulatory environmental programs, including information exchange and development of infrastructures through administration of grants and training.
- 10% increase in federal inspections over FY 97 levels.

WCMD will actively participate in the Region III Strategic Planning Team. For FY99, WCMD will integrate Regional priorities with the Division's program priorities for credible deterrent in the following areas:

**Regional Priorities:**

- **Cities/Urban Environment** particularly enhancing WCMD enforcement presence in priority industrial sectors and places, addressing cumulative risk, with emphasis on environmental justice and children's health.

**Program Leads:**

- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169
- Aquanetta Dickens, Chief, Toxics Programs and Enforcement Branch, 3WC33, 215-814-2080
- Donald Lott, Chief, Pesticides/Asbestos Programs and Enforcement Branch, 3WC32, 215-814-2041
- Harry Daw, Chief, RCRA Compliance and Enforcement Branch, 3WC31, 215-814-3244
- John Humphries, Chief, State Programs Branch, 3WC21, 215-814-3372
- Maria Vickers, Associate Director, Office of RCRA Programs, 3WC10, 215-814-3149

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**Goal #10: Effective Management**

**GPRA Objectives: By 2005,**

- 10.3. Provide a quality work environment that considers employee safety and security, building operations, utilities, facilities, new construction, repairs, and pollution prevention, within Headquarters and nationwide.

**FY99 Performance Measures and Milestones**

- All Division staff will be trained in Regional and Division priorities and understand their respective roles in achieving them.
- Performance standards/appraisals will be established under the PERFORMS system, decoupling awards from the appraisal process. The process will provide opportunities for staff feedback to supervisors and discussion of employee development. Employees will be given the opportunity to set up an individual development plan.
- The assignments of the office management support team will be clarified to reflect the evolving needs of the organization. Systems will be established to monitor the



quality of correspondence, coverage, equipment needs, etc., and needs will be resolved within one month of identification.

- The C2 will develop a divisional communications strategy by 1/1/99.
- Bi-weekly staff meetings for Branches will become the standard. Staff access to supervisors will be enhanced by all possible means, and employee feedback will be welcomed on any and all workplace issues.

### **Integration with other Regional Priorities:**

WCMD will actively participate in the Region III Strategic Planning Teams. For FY99, WCMD will integrate all aspects of human resource management and communications objectives to fulfill Regional priorities with the Division's program priorities.

### **Program Leads:**

- Michael Kulik, Senior Program Advisor, Immediate Office, 3WC00, 215-814-5337
- Joan Schafer, Communications Coordinator, Immediate Office, 3WC00, 215-814-5143
- James Webb, Associate Director, Office of Enforcement, 3WC30, 215-814-3169
- Maria Vickers, Associate Director, Office of RCRA Programs, 3WC10, 215-814-3149
- Wayne Naylor, Chief, Technical and Program Support Branch, 3WC11, 215-814-3385

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### **Communication Strategy for the Strategic Plan**

- Objectives:**
- 1.) To communicate to divisional employees the existence of the Strategic Plan, its objectives and goals, and its relevance as our environmental vision, and explain to them how this year the Division will be evaluated based on their Strategic Plan accomplishments and achievements.
  - 2.) To communicate to the states the Division's vision which identifies our priorities, goals, and objectives and to facilitate our joint efforts to protect our environment and human health.
  - 3.) To communicate to Headquarters our divisional objectives and measures as they pertain to the Agency's GPRA Strategic Plan.
  - 4.) To effectively communicate key points in the Division's Strategic Plan to the public.

**Key Messages:** - The Strategic Plan outlines the objectives and measures the WCMD will use to evaluate the successes of our programs in FY '99 as they relate to specific goals outlined by the

GRPA. It will become the measuring stick the Division will use to evaluate program achievements or accomplishments.

**Audiences:** - WCMD Employees  
State Contacts  
Headquarters  
Public

**Measure:** - Number of program objectives met will depend on WCMD employees' understanding and comprehension of the importance of the Strategic Plan and how it will affect the way they do their jobs

**Guidance:**

The key for managers is to communicate to WCMD employees that every contact with an external stakeholder is an opportunity to accomplish the goals of the Strategic Plan and demonstrate to them how every action or interaction relates to some goal within the plan, i.e., explain to the employees completing FOIA requests how their actions support a goal(s) of the Strategic Plan, specifically.

**Employees need to know “what does it mean to me and how does it affect my work?”**  
Managers need to be able to answer that question for them as specifically as possible.

| Strategy/Action  | Responsibility                     | Key Events/Target Dates  |
|--|------------------------------------|--------------------------|
| <b>WCMD Employees</b><br><br>- Send a draft copy to Associates and Management for their input and review | Director, Senior Technical Advisor | - Completed September 14 |
| - Send a draft of the plan to all employees for their input  | Managers                           | - Completed October 16   |
| - Conduct group meetings to discuss the Strategic Plan   |                                    | - Completed October 31   |

|  |  |   |
|--|--|---|
| <ul style="list-style-type: none"> <li>- Ensure that each employee knows how their contributions will support the branch in meeting their Strategic Plan objectives (face-to-face meetings) <ul style="list-style-type: none"> <li>➤ communicate strategies and expected behaviors to each employee</li> <li>➤ conduct periodic meetings with employees to identify and address specific barriers and behaviors</li> <li>➤ set clear expectations and accountability</li> </ul> </li> </ul>  | Managers                                       | - On-going  |
| <ul style="list-style-type: none"> <li>- Send out a Voice Mail Message regarding the Director's expectations for the division as they support the Strategic Plan - mention that managers will conduct meetings to discuss the specifics of the plan</li> </ul>   | Director                                       | - Completed October 15  |
| <ul style="list-style-type: none"> <li>- Send out a final copy (via e-mail) of the Strategic Plan to all managers for distribution to the employees prior to their branch meeting discussions</li> </ul>   | Director,<br>Managers                          | - Completed October 15  |
| <ul style="list-style-type: none"> <li>- Inform employees regarding the successes and accomplishments of divisional employees in support of the Strategic Plan through the following vehicles: <ul style="list-style-type: none"> <li>➤ divisional newsletter,</li> <li>➤ award presentations (using awards which reinforce the SP vision statement)</li> <li>➤ division meetings,</li> <li>➤ group meetings,</li> <li>➤ posters,</li> <li>➤ salients,</li> <li>➤ articles in regional newsletters, i.e., <i>The Perspective</i>, <i>The Inside Story</i>, etc.</li> </ul> </li> </ul> | Director<br>Managers<br>Director's Staff<br>C2 | <ul style="list-style-type: none"> <li>- On-going</li> <li>- Monthly</li> <li>- Quarterly or Bi-Annually</li> <li>- Periodically</li> <li>- On-going</li> <li>- On-Going</li> <li>- Weekly</li> <li>- On-Going</li> </ul> |

## External Stakeholders

| Strategy/Action  | Responsibility                                 | Key Events/Target Dates |
|--|--|-------------------------|
| Headquarters<br>- Send a draft of the Division Strategic Plan to the RA  | Director                                       | Completed September 16  |
| - Branch Chiefs will contact HQ personnel to notify them that the Strategic Plan will arrive by a specified date and ask their support | Branch Chiefs                                  | Completed September 16  |
| States<br>- Send a draft copy to the states for their input  | Director, Senior Technical Advisor             | Completed September 16  |
| - Associate Directors will contact their counterparts to ask for their cooperation in support of the Strategic Plan                    | Associate Directors                            | Completed September 16  |
| Public<br>- Put significant highlights of the Strategic Plan on the WCMD Website   | Technical and Program Support Branch Chief, C2 | April 15                |
| - Develop an easy-to-read brochure for employees and external stakeholders   | C2, Senior Technical Advisor                   | Completed January 31    |

## **Appendix II: WCMD Plans for Agency Initiatives**

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***Proposal***  
***Children's Health Initiative***  
***Waste and Chemicals Management Division***

**July 10, 1998**

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## ***Children's Initiative Proposal***

### ***Waste and Chemicals Management Division***

**Introduction:** On April 21, 1997, President Clinton signed *Executive Order #13045* encouraging Federal Agencies to ensure their policies consider disproportionate risks to children that result from environmental health or safety risks. The U.S. Environmental Protection Agency has since established the *Office of Children's Health Protection* to assist in implementing this goal.

Historically, both Region III and the States have taken action to protect children's health by focusing program activities in densely populated areas. The 1990 Census demonstrates that the highest concentrations of children are found in our cities and urban centers. It is evident, however, that not all children live in our cities and concentrating our activities on cities and urban centers may not effectively reach high density child populations who reside outside the boundaries of our major cities.

Sustainable development studies have suggested that our urban centers are becoming more diffuse as populations claim larger land portions. The distribution of children according to the 1990 Census reflects this change as some census block groups with large populations of children fall outside the boundaries of our urban centers. Therefore, the focus on smaller communities with large youth populations is a natural progression in our efforts to provide environmental protection to those who are most in need.

**Proposal --** The Waste and Chemicals Management Division (WCMD) recognizes the historical contribution of the States to protect children's health. We also recognize the need to expand our focus beyond the urban centers **to include smaller communities that also have high density child populations.** The present proposal presents existing and modified program measures to better target our activities to those communities with children who are most in need.

**Report Organization:** This report is organized into three sections, each describing stepwise objectives to be accomplished in order to reach our stated goal:

**Section I --** describes the criteria for selecting study areas within Region III.

**Section II --** describes WCMD's activities and the related measurements used to achieve our goal. We recognize that each measure has a definite character and have adopted the Chesapeake Bay hierarchy of measures to express the level of intent for each measure. The program activities and measures are also linked to the *Government Performance and Results Act (GPRA)* goals and issues highlighted within our existing Performance Partnership Agreements. A list of these goals and issues are included in Appendices I and II of this report for easy reference.

**Section III --** outlines a preliminary communications strategy to introduce the proposal to our stakeholders.



## Section I: Selection Criteria

### **Objective#1: Develop criteria for selection of community.**

We will continue our activities in the larger urban centers, however, we have selected four primary criteria to ensure consideration of smaller communities with high concentrations of children and children in poverty.

Using the information contained in the 1990 Census, the number of children will be calculated for each census block group #1 to 23,416. Then, those census block groups with greater than 700 children per block group will be merged with the list of Region III communities containing a total population ranging from 10,000 to 50,000 persons.

Based on the distribution of child populations within the census block groups in Region III, those with greater than 700 represent a set of census block groups with the highest density (approximately 500 census block groups, representing the top 2% of the Region's census block groups). The list will be sorted by 3 age ranges including infants and young children (0-6 years) , youngsters (7-13 years), and teenagers (14-18 years). The list will be further defined by the top 30% of the Region's census block groups containing children in poverty.

The WCMD will review the list for program activity to refresh and enhance existing activities or develop new initiatives. In addition, any additional subpopulations within the targeted areas will be considered.

#### Primary Criteria

- Total number of children (greater than 700 per census block group)
- Total population = 10,000-50,000
- Age of Child: up to 18 years
- Children in Poverty (top 30% of Region)

#### Secondary Criteria

- Investigate area for WCMD programs administered
  - If WCMD programs exist in the area, review and enhance enforcement activity and outreach
  - If no WCMD programs exist in the area, develop enforcement activity and outreach
- Percent of population relying on ground water as primary drinking water source.
- Subsistence farming and Dairy farms
- Poor access to Healthcare

## Section II: Program Measures

### **Objective #2: Implement program measures to benefit children's health**

The Waste and Chemicals Management Division protects human health and the environment using multiple statutory authorities, including RCRA, TSCA, EPCRA, FIFRA and the CAA. These programs utilize enforcement, compliance assistance and public outreach and education as tools to achieve the mission of the Agency within the context of the Government Performance and Results Act (GPRA). There are nine GPRA goals designed to protect human health and the environment under the jurisdiction of EPA programs. In addition to individual program links, all of our programs engage in enforcement activity and their goals coincide with GPRA Goal #9: Credible Deterrent to Pollution and Greater Compliance with the Law. This goal states that EPA will ensure full compliance with laws intended to protect public health and the environment.

#### General activities:

- Inspection activity
- Inspection targeting
- Compliance Monitoring
- Enforcement
- Permits and Cleanups
- Compliance Assistance/Outreach

#### Definition of Measures:

We recognize that each measure serves a distinct purpose and have adopted the Chesapeake Bay Hierarchy of measures to express these differences. The level is indicated beside each measure as 1,2,3,4,5 or 6. At any point in time, jurisdictions, expertise and resource constraints will influence the choice of measures, therefore we view these measures as a continuum, striving to effect changes in the health or ecology of the Region, moving toward level 6. In some cases, the governmental contributions at the lower levels may be appropriate while cultivating partnerships with other entities in order to achieve level 6. The goal in all cases is to achieve a level 6 effect, both through Regional efforts and by dialoging and networking with our partners and other entities.

| Hierarchy of Measures: This is how we measure environmental change (Chesapeake Bay Program/ Environmental Indicators) |                                      |  |                               |                                       |   |
|---|--------------------------------------|--|-------------------------------|---------------------------------------|---|
| Administrative  |                                      | Environmental                            |                               |                                       |   |
| Level 1   | Level 2                              | Level 3                                  | Level 4                       | Level 5                               | Level 6                                     |
| Actions by EPA/State Regulatory Agencies  | Responses of the Regulated Community | Changes in Discharge/Emission Quantities | Changes in Ambient Conditions | Changes in Uptake and/or Assimilation | Changes in Health, Ecology or other effects |

## **►RCRA**

The RCRA Subtitle C program establishes a regulatory framework for managing hazardous waste from generation until ultimate disposal. RCRA also includes requirements for investigation and cleanup of hazardous releases. The primary goals of RCRA are to: 1) Protect human health (including sensitive subpopulations such as children) and the environment from the potential hazards of waste disposal; 2) Conserve energy and natural resources; 3) Reduce the amount of waste generated; 4) ensure that wastes are managed in an environmentally sound manner; and 5) direct cleanups at RCRA facilities.

In addition to the link with Goal #9: Credible Deterrent to Pollution and Greater Compliance with the Law, the goals of the RCRA program are strongly linked to GPRA Goal 5: Better Waste Management and Restoration of Contaminated Waste Sites. This goal ensures that EPA will work towards the cleanup of previously polluted sites and restoration for community uses. This goal is also consistent with the objectives described in the National Performance Partnership Agreements.

### **Inspection activity/Inspection targeting**

#### **Current Measures:**

- 1 Increase # of inspections in targeted areas.

### **Compliance Monitoring/Enforcement**

#### **Current Measures:**

- 2 Increase compliance rate in targeted areas. Compliance rates will be defined by the number and quality of compliance within the regulated community. This may be measured through compliance assistance response, SEPs and other responses of the regulated community.
- 2 Increase compliance with O&M/CME requirements at land-based units in targeted communities.
- 2 Increase compliance with orders and permits for hazardous waste sites (hazardous waste, including pesticides, asbestos and lead)

(Corrective Action, Subtitle C, Subtitle D)

### **Permitting and Cleanups**

#### **Current Measures:**

- 1 Increase # of corrective actions in targeted areas.
- 3 Implement HQ initiatives for risk assessment at combustion facilities, recognizing children as a sensitive subpopulation

- 4 and indirect risks to children through food chain exposures.
- 4 Increase # of children included in “human exposures controlled” at RCRA Corrective Action sites.
- 4 Increase # of children with reduced exposure due to drinking water improvement
- 4 Reduce # of uncontrolled dumpsites in targeted areas

### **Compliance Assistance/Outreach**

#### **Future Measures:**

- 1 Extend WCMD program outreach related to household hazardous waste collection. On the local level, communities that have several farms may offer household pesticide collection that may be trackable. Potential local contacts for this may be the Local or County Department of Public Health, or Local or County Department of Solid Waste

### **►UST/LUST**

The RCRA Subtitle I UST/LUST program establishes regulations that require owners and operators of new tanks and tanks already in the ground to prevent, detect and clean up releases. The LUST Trust Fund was created to be used for two purposes: 1) To oversee cleanups by responsible parties; and 2) To pay for cleanups at sites where the owner or operator is unknown, unwilling, or unable to respond, or which require emergency action.

The UST/LUST program’s goals focus on GPRA Goals #2 and #5. Goal #2: Clean and Safe Water commits the EPA to work toward effective protection of our water systems, so that all citizens, including our children, will have clean and safe water to drink. Goal #5: Better Waste Management and Restoration of Contaminated Waste Sites ensures that EPA will strive to reduce or control risk at sites contaminated by leaking underground storage tanks. These goals are also consistent with objectives described in the National Performance Partnership Agreements.

### **Inspection activity/Inspection targeting**

#### **Current Measures:**

- 1 Increase # of inspections in targeted areas

#### **Future Measures:**

- 2 Report leak detection, upgrade, closure and follow-up inspections

## **Compliance Monitoring/Enforcement**

### **Current Measures:**

- 
- - 2 Increase compliance rate with UST leak detection requirements and 1998 upgrade requirements in targeted areas.

## **Permitting and Cleanups**

### **Current Measures:**

- - 3 Number of alternate water supplies provided in threatened groundwater by utilizing GIS coverages from the wellhead protection program.

## **Compliance Assistance/Outreach**

### **Future Measures:**

- - 2 Report onsite compliance assistance

## **► Waste Minimization**

The goals of the Region III Waste Minimization Program follow from the Waste Minimization National Plan goals, which are to 1) reduce the volume and toxicity of the most persistent, bioaccumulative, and toxic (PBT) chemicals in hazardous waste by 25% and 50% by the years 2000 and 2005, respectively; 2) prevent cross-media transfers of hazardous wastes; and 3) emphasize source reduction and environmentally sound recycling over waste treatment and disposal.

To accomplish these goals, the Region III Waste Minimization Program will develop a PBT target list and targeting strategy, implement a Recognition Program to motivate industry to change its waste generation practices, implement an outreach and education program, and organize technical conferences and publicize success stories to share technological advancements and waste minimization strategies among Region III businesses.

The Region III Waste Minimization Program will support the goals of the WCMD Children's Initiative. Once the PBT list is developed (i.e., by State, those sectors or specific facilities that generate the largest amounts or greatest toxicity of PBT chemicals) and combined with other chemical indexing data, the Waste Min team will focus its efforts within a subset of facilities having the greatest potential to negatively impact the Region's children.

Through the planned reduction of PBT chemicals, the Waste Minimization

Program is linked with GPRA Goal #4: Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems. This goal is aimed at developing pollution prevention strategies that will cost-effectively eliminate, reduce or minimize emissions and contamination.

### **Inspection Activity/Inspection Targeting and Compliance Monitoring**

- The Waste Minimization Program's primary focus is compliance assistance. Waste Minimization principles are considered during the inspection targeting processes used by the multiple programs within the Waste and Chemicals Management Division (WCMD) and compliance assistance is offered to the regulated community during the enforcement process, but not typically during an inspection.

### **Compliance Assistance/Outreach**

#### **Current Measures:**

- 2 Ensure that targeted facilities have in place working source reduction plans
- 2 Ensure that targeted facilities are implementing (or will plan to implement) effective waste minimization strategies in their operations
- 1 Increase awareness of EPA's waste minimization goals
- 2 Motivate any facilities that generate PBT or other hazardous wastes to adopt waste minimization strategies in their operations

#### **Future Measures:**

- 1 Analyze the **PBT list** to focus the measures noted above on those chemicals to which children are particularly susceptible through direct contact (e.g., any pesticides, lead, and other indoor air contaminants)

### **► TSCA**

The Toxic Substances and Control Act (TSCA) was mandated by Congress to protect human health and the environment. The TSCA statute covers many areas and has regulations that provide important information that is vital to the public. The various sections of TSCA encompass matters that concern Lead, polychlorinated biphenyls (PCBs), the manufacturing and importing of new and existing chemicals and asbestos abatement planning. By actively inspecting facilities, providing compliance assistance to the regulated community and enforcing against violators of the regulations, the TSCA program will ensure a safer, more protected environment for children to go to school, reside and play.

The goals of all of the programs within TSCA in Region III are strongly linked to GPRA Goal #9: Credible Deterrent to Pollution and Greater Compliance with the Law. Within this framework, our objectives are to identify and reduce significant non-compliance and maintain a strong enforcement presence. At the same time, the Region will recognize and reward voluntary responsiveness of the regulated community through compliance incentives and assistance activities.

### ► Core TSCA

The Core TSCA Program, which comprises Sections 4, 5, 8, 12, and 13 under TSCA, regulates the importing, manufacturing, and use of new and existing chemicals and chemical substances. Accurate information involving toxicity, environmental and health effects required for submission to EPA is essential for the program's success. Pollution Prevention (P2) and source reduction of various waste streams are often considered and discussed when conducting an inspection.

### Inspection Activity/Inspection Targeting

#### **Current Measures:**

- 1 Increase in number of businesses to be inspected based on densely populated areas with surrounding chemical manufacturing facilities

#### **Future Measures:**

- 1 Increase in number of inspections with Customs Department to identify brokers of improperly imported chemicals

### Compliance Monitoring/Enforcement

#### **Current Measures:**

- 1 Increase in number of enforcement actions of facilities which do not report the manufacture and use of chemicals

### Compliance Assistance/Outreach

#### **Future Measures:**

- 1 Increase the number of workshops/seminars to be conducted and pamphlet/information distribution to Customs Department personnel and the general public.

### ► Lead (Pb)

Our strategy is to raise awareness among populations at greatest risk so

that they have the tools and information to ensure that sales and rental transactions are in compliance with §1018 of the Toxic Substances and Control Act. Although this statute applies to all sellers and lessees of older housing, Region 3 is focusing compliance assistance and enforcement activities on landlords.

### **Inspection Activity/Inspection Targeting**

#### **Current Measures:**

- 1 Increase # inspections performed in targeted areas

### **Compliance Monitoring/Enforcement**

#### **Current Measures:**

- 1 Increase in # of people who understand their rights for information under §1018 and how to prevent lead hazards. This information is currently collected through the community based and state grantee quarterly reporting and Federal outreach activities. Data collected currently includes # of brochures sent and # of people attending outreach activities.
- 1 Increase in # of enforcement actions taken and compliance with orders for lead-safe or lead free housing.

#### **Future Measures:**

- 2 Increases in the # of parents who understand their rights rather than the total # of people would clearly focus our outreach activities toward the population segments at highest risk for lead-poisoned children. Similarly identification of new parents using census birthrate or household structure information would serve to improve the effectiveness of outreach activities that may lead to changes in living habits. These data could be obtained by upgrading existing surveys administered during our current Federal and State grantee outreach activities. The upgrade might consist of a few additional questions pertaining to the existence of children in the household and their ages.
- 3 Increases in the number of housing units that have been made lead-safe or lead-free. This information can be obtained through coordination with HUD and our local and state grantees. HUD provides support for abatements and stabilizations for a limited number of qualifying properties and state inspectors may issue lead -free certifications to



property owners in order to exempt these properties from §1018 disclosure requirements. will be issued to homeowners and landlords. These data are collected and housed by HUD and our state and local grantees.

- 2 Increases in the number of landlords participating in state or local government sponsored “lead-safe” incentive programs would indicate improvements within the regulated community. This information can also be obtained through coordination with HUD, through the grants quarterly reporting process, and through state reports to be provided as a condition of a state-run delegated Lead Program.

### **Compliance Assistance/Outreach**

#### **Current Measures:**

- 1 Exert influence at the grassroots/community level to help improve awareness and build coalitions.
- 1 Increase onsite compliance assistance provided in targeted areas

#### **Future Measures:**

- 1 Exert influence with national healthcare organizations and state agencies to improve Pb-screening and reporting rates.

### **► PCBs**

The Regional PCB Program was established to provide a credible deterrent to improper disposal of PCBs, and to promote their proper management to prevent and detect accidental releases. The methods to effectively implement the regulations governing PCBs are through performing inspections, developing enforcement actions, and conducting outreach/compliance assistance activities.

### **Inspection Activity/Inspection Targeting**

#### **Current Measures:**

- 1 Increase in number of facilities/buildings to be inspected that contain PCB equipment.
- 1 Conduct inspections of greater risk areas, i.e.,

improper disposal (spills) of PCBs

**Future Measures:**

- 1 Increase number of inspections in school systems of large cities, i.e., Baltimore School District, Pittsburgh School District, Richmond School District

**Compliance Monitoring/Enforcement**

**Current Measures:**

- 1 Increase in number of enforcement actions of demonstrated non-compliance, i.e., PCB spill areas/improper disposal, inadequate maintenance of PCB Equipment

**Compliance Assistance/Outreach**

**Future Measures:**

- 1 Conduct workshops/seminars and perform pamphlet/information distribution regarding the uses and compliance requirements of PCBs and PCB Equipment to the general public

► **Asbestos (AHERA)**

The Asbestos Hazard Emergency Response Act (AHERA) governs the managements of asbestos-containing materials in school, both public and private from grades K-12. Every state in the country is involved with the program.

**Inspection Activity/Inspection Targeting**

**Current Measures:**

- 1 Increase inspections of school asbestos management plans
- 1 Increase # of schools where inspections of abatement activities occur.

**Compliance Monitoring/Enforcement**

**Current Measures:**

- 1 Increase in # of enforcement actions in targeted areas.

### **Compliance Assistance/Outreach**

#### **Future Measures:**

- 1 Increase # of information exchange workshops/seminars for individuals responsible for developing school asbestos management plans.

### **►EPCRA**

The “Superfund Amendments and Reauthorization Act of 1986” (SARA), also known as the “Emergency Planning and Community Right to Know Act” (EPCRA), was enacted on October 17, 1986. Owners and operators of facilities subject to the requirements of §313 of EPCRA must report releases and offsite transfers of listed toxic chemicals to all environmental medium to the EPA by July 1. This information is compiled in the Toxic Release Inventory System (TRIS) and is made available to governments and the public.

TRIS is used by federal and state governments to determine trends in toxic chemical releases and as a vehicle for developing new environmental regulations. GPRA Goal # 7: Expansion of American’s Right-to-Know about their Environment seeks to provide easy access to environmental information and tools to enable citizens to protect their communities and their children. The compliance assistance and outreach activities of this program serve to support the achievement of this goal through increased exchange of information between governments and the public.

The goals of the EPCRA §313 program are also to achieve full compliance by non-reporters and inaccurate reporters through compliance assistance and enforcement activity. The EPCRA §313 program seeks to achieve tangible environmental benefits through the use of supplemental environmental projects as part of the enforcement case settlement process. These goals coincide with GPRA Goal #9: Credible Deterrent to Pollution and Greater Compliance with the Law.

### **Inspection Activity/Inspection Targeting**

#### **Current Measures:**

- 1 # of inspections in targeted areas

### **Compliance Monitoring/Enforcement**

#### **Current Measures:**

- 1 # of enforcement actions in targeted areas
- 2 # of additional facilities coming into compliance as a result of enforcement activity
- 3 Total decrease of annual toxic chemical releases in targeted areas

### **Compliance Assistance/Outreach**

#### **Future Measures:**

- 2 Improved knowledge of chemical releases in areas with high # of children through the issuance of press releases pertaining to TRI releases in targeted areas.

### **► FIFRA**

The FIFRA program goals are linked to GPRA Goals #2 and #3. GPRA Goal #2: Clean and Safe Water ensures that the EPA will work to protect our water systems, so that all citizens will have clean and safe water to drink. GPRA Goal #3: Safe Food ensures that all Americans, particularly children, will be able to eat foods free from unsafe pesticide residues. Both of these goals are supported by the FIFRA program measures including crop residue sampling and groundwater protection.

### **Inspection Activity/Inspection Targeting** **Compliance Monitoring/Enforcement**

#### **Current Measures:**

- 4 Increase in # of violative crop residue samples in farm markets.

We will try to focus our collection of crop residue samples that are generally eaten by children. We will investigate feasibility of residue sampling data from FDA or USDA to reach supermarkets and restaurants

The Farmgate program has been implemented by DC and MD. These states are monitoring residue samples from crops that are collected at farm markets. Some samples are being analyzed for specific (expected?) pesticides, others are subject to a broad spectrum analysis. Types of foods consumed by age obtained from ORD's Exposure Factor's handbook, based on USDA market basket studies.

**Future Measures:**

- 4 Improvement in groundwater serving areas with high populations of children.

The list of pesticides to be tested include the 5 management plan (SMP) pesticides atrazine, alachlor, cyanazine, metolachlor and simazine. These pesticides are specific for certain crops.

**Compliance Assistance/Outreach****Current Measures:**

- 2 Increased number of schools using IPM technologies.
- 2 Amount of information distributed through DC Poison Prevention project -- March 1998 (Results: over 1200 students in Anacostia neighborhood reached. Approximately 2000 pieces of information distributed to students and adults).
- 1 Number of children informed of pesticide risks through EPA outreach activities.

**Future Measures:****► CAA Asbestos**

Our current strategy is to focus on businesses with buildings undergoing renovation/demolition. As resources permit, we will take the opportunity to coordinate with renovations/demolitions occurring in other types of public buildings including schools and apartment buildings.

**Inspection Activity/Inspection Targeting****Current Measures:**

- 1 Increase inspections in buildings undergoing renovation/demolition in targeted areas.

**Compliance Monitoring/Enforcement****Current Measures:**

- 1 Increase in # of enforcement actions in targeted areas.

## **Compliance Assistance/Outreach**

### **Future Measures:**

- 1 Increase # of information exchange workshops/seminars for building owners and professional builders guilds.

### *Section III: Communication Strategy*

The Region will endeavor to communicate our goals, objectives and priorities to our states, local governments, regulated communities and the general public. In order to communicate our current activities that protect children, an interim strategy is included in this proposal. A fully developed communications strategy will be put in place by the end of FY98.

States/ Local Governments: We will share the proposal with our States and local governments and outline our objectives for the Children's Health Initiative in our Regional grant guidance. We encourage the States to include activities related to the Children's Health Initiative in their grant proposals and emphasize the importance of the initiative through the grants negotiation process. In conjunction with the grants process, we will issue a letter to state program directors and program managers and local governments introducing the initiative and including a fact kit.

We recognize that certain statutes contain eligibility requirements pertaining to outreach activities. The Region will endeavor to remain as flexible as possible within our statutory authority.

Regulated Community: Details of the initiative will be included as part of the existing compliance assistance activities. Our formal compliance assistance forums, such as EPCRA and Waste Minimization workshops will include an introduction to our Children's Health Proposal that will be shared with the regulated community. In addition, we will prepare generic and program specific fact kits for inspectors conducting onsite compliance assistance activities.

Public: In order to inform the public of our activities, we will include program accomplishments that pertain to the Children's Health Initiative on our WCMD web page and provide opportunities for public participation and involvement through our outreach programs. For those entities that do not have web access, we will utilize and develop existing infrastructures such as public welfare and religious organizations and state or privately funded programs for needy families such as the Philadelphia Coalition for Children and Youth (PCCY).

We will continue to develop our relationship with our academic partners through free information exchange forums as well as our grants process to better characterize the changes in the health status of children resulting from environmental intervention in our selected communities.

**Appendix I**  
**Government Performance Results Act (GPRA) Goal Summary**

**1) Clean Air:**

*The air in every Region III community will be safe and healthy to breathe. In particular, children, the elderly, and people with respiratory ailments will be protected from health risks of breathing polluted air. Reducing air pollution will also protect the environment, resulting in many benefits, such as restoring life in damaged ecosystems and reducing health risks to those subsistence depends directly on those ecosystems.*

**2.) Clean and Safe Water:**

*All citizens in Region III will have drinking water that is clean and safe to drink. Effective protection of rivers, lakes, wetlands, aquifers, and coastal and ocean waters will sustain fish, plants, and wildlife, as well as recreation, subsistence, and economic activities. Watersheds and their aquatic ecosystems will be restored and protected to improve human health, enhance water quality, reduce flooding, and provide habitat for wildlife.*

**3) Safe Food:**

*The foods Americans eat will be free from unsafe pesticides residues. Children especially will be protected from the health threats posed by tainted food, because they are among the most vulnerable groups in our society.*

**4) Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems:**

*Pollution prevention and risk management strategies aimed at cost-effectively eliminating, reducing, or minimizing emissions and contamination will result in cleaner and safer environments in which all Americans can reside, work and enjoy life. EPA will safeguard ecosystems and promote the health of natural communities that are integral to the quality of life in this nation.*

**5) Better Waste Management and Restoration of Contaminated Waste Sites:**

*America's wastes will be stored, treated, and disposed of in ways that prevent harm to people and the natural environment. EPA will work to clean up previously polluted sites and restore them to uses appropriate for surrounding communities.*



**6) Reduction of Global and Cross-Border Environmental Risks:**

*The United States will lead other nations in successful, multilateral efforts to reduce significant risks to human health and ecosystems from climate change, stratospheric ozone depletion, and other hazards of international concern.*

**7) Expansion of Americans' Right to Know About Their Environment:**

*Easy access to a wealth of information about the state of their local environment will expand citizen involvement and give them tools to protect their families and their communities as they see fit. Increased information exchange between scientists, public health officials, businesses, citizens, and all levels of government will foster greater knowledge about the environment and what can be done to protect it.*

**8) Sound Science, Improved Understanding of Risk, and Greater Innovation to Address Environmental Problems:**

*EPA will develop and apply the best available science for addressing current and future environmental hazards, as well as new approaches toward improving environmental protection.*

**9) A Credible Deterrent to Pollution and Greater Compliance with the Law:**

*EPA will ensure full compliance with laws intended to protect public health and the environment.*

**Appendix II**  
**Core Performance Measures for FY1998**

As developed by  
the National Program Managers in collaboration with State Environmental Commissioners  
August 1997

***Better Waste Management and Restoration of Abandoned Waste Sites:***

***America's wastes will be stored, treated, and disposed of in ways that prevent harm to people and the natural environment. EPA will work to clean up previously polluted sites and restore them to uses appropriate for surrounding communities.***

***Preventing Pollution and Reducing Risk in Communities, Homes, Workplaces and Ecosystems:***

***OSWER: Pollution prevention and risk management strategies aimed at cost-effectively eliminating, reducing, or minimizing emissions and contamination will result in cleaner and safer environments in which all Americans can reside, work and enjoy life. EPA will safeguard ecosystems and promote the health of natural communities that are integral to the quality of life in this nation.***

***OPP: Ensure that communities, workplaces, ecosystems are safe from pollution. By relying on pollution prevention and other approaches that eliminate, reduce or minimize emissions, and contamination with respect to how we produce, consume, use, reuse, and recycle materials, all Americans will live and work in safe environments and healthy communities.***

***OPPT: In a collaborative effort, EPA and ECOS will address the following issues:***

- (1) Broadening the P2 core measures from a core measure for the toxics program to one that encompasses all EPA programs***
- (2) Developing an approach for enhancing an ability to measure results that stem from pollution prevention activities***
- (3) Coordinating and getting input from appropriate stakeholders in the P2 arena.***

***Safe Food:***

***The foods Americans consume will continue to be safe for all Americans to eat.***

**Appendix III: Region 3 FY99 Priorities**

1. Chesapeake Bay and Other Estuaries
2. Impacts of Acidification
3. Ozone
4. Cities/Urban Environment
5. Climate Change

**Appendix IV: Tabular Performance Measures**

| <i>Programs</i> |  | <i>Level</i> | <i>Current Measures</i>   | <i>Level</i> | <i>Future Measures</i> |
|-----------------|--|--------------|---|--------------|------------------------|
| RCRA            | <i>Inspection Activity/<br/>Inspection Targeting</i> | <i>1</i>     | <i>Increase # of inspections in targeted areas</i>  |              |                        |
|                 | <i>Compliance Monitoring /<br/>Enforcement</i>       | <i>2</i>     | <i>Increase compliance rate in targeted areas.<br/>Compliance rates will be defined by the number and quality of compliance within the regulated community</i>                              |              |                        |
|                 |  | <i>2</i>     | <i>Increase compliance with O&amp;M/CME requirements at land-based units in targeted communities</i>  |              |                        |
|                 |  | <i>2</i>     | <i>Increase compliance with orders and permits for hazardous waste sites (hazardous waste, including pesticides, asbestos, and lead)<br/>(Corrective Action, Subtitle C, Subtitle D)</i>    |              |                        |
|                 | <i>Permitting and<br/>Cleanups</i>                   | <i>1</i>     | <i>Increase # of corrective actions in targeted areas</i>   |              |                        |
|                 |  | <i>3</i>     | <i>Implement HQ initiatives for risk assessment at combustion facilities, recognizing children as a sensitive subpopulation and indirect risks to children through food chain exposures</i> |              |                        |
|                 |  | <i>4</i>     | <i>Increase # of children included in “human exposures controlled” at RCRA Corrective Action sites</i>  |              |                        |
|                 |  | <i>4</i>     | <i>Increase # of children with reduced exposure due to drinking water improvement</i>   |              |                        |
|                 |  | <i>4</i>     | <i>Reduce # of uncontrolled dumpsites in targeted areas</i>   |              |                        |

|                           |  |          |  |          |  |
|---------------------------|--|----------|--|----------|--|
|                           | <i>Compliance Assistance/ Outreach</i>           |          |  | <i>1</i> | <i>Extend WCMD program outreach related to household hazardous waste collection. On the local level, communities that have several farms may offer household pesticide collection that may be trackable. Potential local contacts for this may be the Local or County Department of Public Health, or Local or County Department of Solid Waste.</i> |
| <i>UST/LUST</i>           | <i>Inspection Activity/ Inspection Targeting</i> | <i>1</i> | <i>Increase # of inspections in targeted areas</i>   | <i>2</i> | <i>Report leak detection, upgrade, closure and follow-up inspections</i>   |
|                           | <i>Compliance Monitoring/ Enforcement</i>        | <i>2</i> | <i>Increase compliance rate with UST leak detection requirements and 1998 upgrade requirements in targeted areas</i>   |          |  |
|                           | <i>Permitting and Cleanups</i>                   | <i>3</i> | <i>Number of alternate water supplies provided in threatened groundwater by utilizing GIS coverages from the wellhead protection program</i>   |          |  |
|                           | <i>Compliance Assistance / Outreach</i>          |          |  | <i>2</i> | <i>Report onsite compliance assistance</i>   |
| <i>Waste Minimization</i> |  |          | <i>The Waste Minimization Program's primary focus is compliance assistance. Waste minimization principles are considered during the inspection targeting processes used by the multiple programs within the Waste and Chemicals Management Division (WCMD) and compliance assistance is offered to the regulated community during the enforcement process, but not typically during an inspection.</i> |          |  |

|                                 |  |                                     |   |   |  |
|---------------------------------|--|-------------------------------------|---|---|--|
|                                 | <i>Compliance Assistance/ Outreach</i>           | <p>2</p> <p>2</p> <p>1</p> <p>2</p> | <p><i>Ensure that targeted facilities have in place working source reduction plans</i></p> <p><i>Ensure that targeted facilities are implementing (or will plan to implement) effective waste minimization strategies in their operations</i></p> <p><i>Increase awareness of EPA's waste minimization goals</i></p> <p><i>Motivate any facilities that generate PBT or other hazardous wastes to adopt waste minimization strategies in their operations</i></p> | 1 | <i>Analyze the PBT list to focus the measures noted above on those chemicals to which children are particularly susceptible through direct contact (e.g., any pesticides, lead, and other indoor air contaminants)</i> |
| <i>TSCA</i><br><i>Core TSCA</i> | <i>Inspection Activity/ Inspection Targeting</i> | 1                                   | <i>Increase the number of businesses to be inspected based on densely populated areas with surrounding chemical manufacturing facilities</i>  | 1 | <i>Increase in number of inspections with Customs Department to identify brokers of improperly imported chemicals</i>  |
|                                 | <i>Compliance Monitoring/ Enforcement</i>        | 1                                   | <i>Increase in number of enforcement actions of facilities which do not report the manufacture and use of chemicals</i>   |   |  |
|                                 | <i>Compliance Assistance/ Outreach</i>           |                                     |   | 1 | <i>Increase the number of workshops/seminars to be conducted and pamphlet/information distribution to Customs Department personnel and the general public</i>  |
| <i>Lead (Pb)</i>                | <i>Inspection Activity/ Inspection Targeting</i> | 1                                   | <i>Increase # of inspections performed in targeted areas</i>  |   |  |



|                         |  |          |  |          |  |
|-------------------------|--|----------|--|----------|--|
| <i>PCBs</i>             | <i>Inspection Activity/<br/>Inspection Targeting</i> | <i>1</i> | <i>Increase in number of facilities/buildings to be inspected that contain PCB equipment</i>   | <i>1</i> | <i>Increase number of inspections in school systems of large cities, i.e., Baltimore School District, Pittsburgh School District, Richmond School District</i>                 |
|                         |  | <i>1</i> | <i>Conduct inspections of greater risk areas, i.e., improper disposal (spills) of PCBs</i>   |          |  |
|                         | <i>Compliance Monitoring/<br/>Enforcement</i>        | <i>1</i> | <i>Increase the number of enforcement actions of demonstrated non-compliance, i.e., PCB spill areas/improper disposal, inadequate maintenance of PCB equipment</i> |          |  |
|                         | <i>Compliance Assistance/</i>                        |          |  | <i>1</i> | <i>Conduct workshops/seminars and perform pamphlet/information distribution regarding the uses and compliance requirements of PCBs and PCB equipment to the general public</i> |
| <i>Asbestos (AHERA)</i> | <i>Inspection Activity/<br/>Inspection Targeting</i> | <i>1</i> | <i>Increase inspections of school asbestos management plans</i>  |          |  |
|                         |  | <i>1</i> | <i>Increase # of schools where inspections of abatement activities occur</i>   |          |  |
|                         | <i>Compliance Monitoring/<br/>Enforcement</i>        | <i>1</i> | <i>Increase # of enforcement actions in targeted areas</i>   |          |  |
|                         | <i>Compliance Assistance/<br/>Outreach</i>           |          |  | <i>1</i> | <i>Increase # of information exchange workshops/seminars for individuals responsible for developing school asbestos management plans</i>                                       |



|              |  |                                  |  |          |  |
|--------------|--|----------------------------------|--|----------|--|
| <b>EPCRA</b> | <b>Inspection Activity/<br/>Inspection Targeting</b> | <b>1</b>                         | <b>Increase # of inspections in targeted areas</b>   |          |  |
|              | <b>Compliance Monitoring/<br/>Enforcement</b>        | <b>1</b><br><b>2</b><br><b>3</b> | <b>Increase # of enforcement actions in targeted areas</b><br><b>Increase # of additional facilities coming into compliance as a result of enforcement activity</b><br><b>Total decrease of annual toxic chemical releases in targeted areas</b>   |          |  |
|              | <b>Compliance Assistance/<br/>Outreach</b>           |                                  |  | <b>2</b> | <b>Improved knowledge of chemical releases in areas with high # of children through the issuance of press releases pertaining to TRI releases in targeted areas</b>  |
| <b>FIFRA</b> | <b>Compliance Monitoring/<br/>Enforcement</b>        | <b>4</b>                         | <b>Increase # of violative crop residue samples in farm markets</b><br><b>We will try to focus our collection of crop residue samples that are generally eaten by children. We will investigate feasibility of residue sampling data from FDA or USDA to reach supermarkets and restaurants,</b><br><br><b>The Farmgate program has been implemented by DC and MD. These states are monitoring residue samples from crops that are collected at farm markets. Some samples are being analyzed for specific (expected?) Pesticides, others are subject to a broad spectrum analysis. Types of foods consumed by age obtained from ORD's Exposure Factor's handbook, based on USDA market basket studies</b> | <b>4</b> | <b>Improvement in groundwater serving areas with high populations of children</b><br><br><b>The list of pesticides to be tested include the 5 management plan (SMP) pesticides atrazine, alachlor, cyanazine, metolachlor and simazine. These pesticides are specific for certain crops.</b> |

|                     |  |                     |  |   |   |
|---------------------|--|---------------------|--|---|---|
|                     | <i>Compliance Assistance/ Outreach</i>           | 2<br><br>2<br><br>1 | <i>Increased number of schools using IPM technologies</i><br><br><i>Amount of information distributed through DC Poison Prevention project -- March 1998 (Results: over 1200 students in Anacostia neighborhood reached. Approximately 2000 pieces of information distributed to students and adults).</i><br><br><i>Number of children informed of pesticides risks through EPA outreach activities</i> |   |   |
| <i>CAA Asbestos</i> | <i>Inspection Activity/ Inspection Targeting</i> | 1                   | <i>Increase inspections in buildings undergoing renovation/demolition in targeted areas</i>  |   |   |
|                     | <i>Compliance Monitoring/ Enforcement</i>        | 1                   | <i>Increase# of enforcement actions in targeted areas</i>  |   |   |
|                     | <i>Compliance Assistance/ Outreach</i>           |                     |  | 1 | <i>Increase # of information exchange workshops/seminars for building owners and professional builders guilds</i> |

## **Appendix V: Supporting Data**

### **Possible Health Outcomes**

A definitive list of possible health outcomes that could result from exposure to environmental toxins has not yet been determined. We will be working with our academic partners to better delineate this list in an effort to monitor the effectiveness of our program activities. We have adopted the hierarchy of measures used by the Chesapeake Bay Program. to better describe our activities. These levels range from 1 to 6 and encompass both administrative actions by the EPA and State regulatory agencies as well as effecting changes in human health or ecology. A definition of the measures is included in the table below. Clearly, many of our program activities and measurements deal with measures at the lower end of the scale, however, through our partnerships with the academic community, epidemiologic and health surveillance tools can be utilized as we strive to reach the highest level environmental change.

| <b>Hierarchy of Measures:</b> This is how we measure environmental change (Chesapeake Bay Program/ Environmental Indicators) |                                      |  |                               |                                       |   |
|--|--------------------------------------|--|-------------------------------|---------------------------------------|---|
| Administrative   |                                      | Environmental                            |                               |                                       |   |
| Level 1  | Level 2                              | Level 3                                  | Level 4                       | Level 5                               | Level 6                                     |
| Actions by EPA/State Regulatory Agencies   | Responses of the Regulated Community | Changes in Discharge/Emission Quantities | Changes in Ambient Conditions | Changes in Uptake and/or Assimilation | Changes in Health, Ecology or other effects |

### **Data needs, sources, and health outcomes**

These lists are not exhaustive and subject to modifications.

Some health outcomes under consideration include:

- Acute upper respiratory morbidity
- Asthma
- Allergy
- Nervous system disorders
- Cancer
- Perinatal issues
- Birth defects

Potential Data Sources:

1. EPA/ORD/NCEA (National Center for Environmental Assessment) Exposure Factors Handbook: types of foods consumed by children
2. Local Poison Control Center data: poisonings due to household chemicals/pesticides
3. EPA/ORD/EPIC (Environmental Photographic Interpretation Center) photos: location of

uncontrolled dump sites

4. EPA/CERCLA: list of Pre NPL sites to locate uncontrolled dump sites
5. EPA/Well Head Protection Program: locations of public supply wells
6. USGS: locations of private groundwater wells.
7. Public Health Service (PHS) potential source to influence improvements in child healthcare.
8. Abstracts of Proposed Community Tools (currently under review by the Communications and Outreach Workgroup of the children's Health protection Advisory Committee)
9. An Ecological Assessment of the United States Mid-Atlantic Region: A Landscape Atlas

Potential Data Needs:

1. Lists of State Hospital Associations
2. Survey of public knowledge on lead in selected communities.
3. State Health Department vital statistics
4. State/HUD Lead programs for data on Pb-safe and Pb-free housing such as # abatement activities, # certifications for lead-free homes and other forms of notification that stabilization has occurred.

\*\*\*\*\*

## Appendix VII: Selected Cities

[illegible]









[illegible]



|                     |       |                     | High Density Child Populations                           |             |              |  |             |              |  |             |              | High Density Poverty                                   |  |  |
|---------------------|-------|---------------------|--|-------------|--------------|--|-------------|--------------|--|-------------|--------------|--|--|--|
|                     |       |                     | Age<br>0-6   | Age<br>7-13 | Age<br>14-18 | Age<br>0-6   | Age<br>7-13 | Age<br>14-18 | Age<br>0-6   | Age<br>7-13 | Age<br>14-18 | Total Persons in Poverty                               |  |  |
| City                | State | Total<br>Population | Within 1 mile of a high<br>density census block<br>group |             |              | Within 2 mile of a high<br>density census block<br>group |             |              | Within 3 mile of a high<br>density census block<br>group |             |              | Within 1 mile<br>of a top 30%<br>census block<br>group | Within 2 mile<br>of a top 30%<br>census block<br>group | Within 3 mile<br>of a top 30%<br>census block<br>group |
| Bailey's Crossroads | VA    | 19,507              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Blacksburg          | VA    | 34,590              |  |             | Y            |  |             | Y            |  |             | Y            | Y  | Y  | Y  |
| Bon Air             | VA    | 16,413              |  | Y           |              | Y  | Y           | Y            | Y  | Y           | Y            |  |  | Y  |
| Bristol             | VA    | 18,426              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Cave Spring         | VA    | 24,053              |  | Y           | Y            |  | Y           | Y            |  | Y           | Y            |  |  | Y  |
| Centreville         | VA    | 26,585              | Y  | Y           |              | Y  | Y           | Y            | Y  | Y           | Y            |  |  |  |
| Chantilly           | VA    | 29,337              | Y  | Y           | Y            | Y  | Y           | Y            | Y  | Y           | Y            |  |  |  |
| Charlottesville     | VA    | 40,341              |  |             |              |  |             | Y            |  |             | Y            | Y  | Y  | Y  |
| Chester             | VA    | 14,986              |  |             |              |  |             |              |  |             |              |  | Y  | Y  |
| Christiansburg      | VA    | 15,004              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Colonial Heights    | VA    | 16,064              |  |             |              |  |             | Y            |  |             | Y            |  | Y  | Y  |
| Dale City           | VA    | 47,170              |  | Y           |              | Y  | Y           | Y            | Y  | Y           | Y            |  |  | Y  |
| East Highland Park  | VA    | 11,850              |  |             |              |  |             |              |  |             |              |  | Y  | Y  |
| Fairfax             | VA    | 19,622              |  |             |              | Y  | Y           | Y            | Y  | Y           | Y            |  |  |  |
| Fort Hunt           | VA    | 12,989              |  |             |              |  | Y           |              |  | Y           |              |  |  | Y  |
| Franconia           | VA    | 19,882              |  |             |              |  | Y           |              | Y  | Y           |              |  |  |  |
| Fredericksburg      | VA    | 19,027              |  |             |              |  |             |              | Y  | Y           | Y            | Y  | Y  | Y  |
| Front Royal         | VA    | 11,880              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Groveton            | VA    | 19,997              |  | Y           |              | Y  | Y           |              | Y  | Y           |              |  | Y  | Y  |
| Harrisonburg        | VA    | 30,707              |  |             | Y            |  |             | Y            |  |             | Y            | Y  | Y  | Y  |
| Herndon             | VA    | 16,139              | Y  | Y           |              | Y  | Y           | Y            | Y  | Y           | Y            |  | Y  | Y  |
| Highland Springs    | VA    | 13,823              |  |             |              |  |             |              |  |             |              |  |  |  |
| Hollins             | VA    | 13,305              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Hopewell            | VA    | 23,101              |  |             |              | Y  | Y           | Y            | Y  | Y           | Y            | Y  | Y  | Y  |
| Hybla Valley        | VA    | 15,491              |  | Y           |              | Y  | Y           |              | Y  | Y           |              |  | Y  | Y  |
| Idylwood            | VA    | 14,710              |  |             |              |  |             |              |  | Y           |              |  |  |  |
| Jefferson           | VA    | 25,782              |  |             |              |  | Y           |              |  | Y           |              |  |  | Y  |
| Lake Ridge          | VA    | 23,862              | Y  | Y           | Y            | Y  | Y           | Y            | Y  | Y           | Y            |  | Y  | Y  |
| Lakeside            | VA    | 12,081              |  |             |              |  |             |              |  |             |              |  | Y  | Y  |
| Laurel              | VA    | 13,011              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Leesburg            | VA    | 16,202              |  |             |              |  |             |              |  |             |              | Y  | Y  | Y  |
| Lincolnia           | VA    | 13,041              |  |             |              |  |             |              |  | Y           |              |  | Y  | Y  |
| Lorton              | VA    | 15,385              |  |             |              | Y  | Y           |              | Y  | Y           | Y            |  |  |  |



[illegible]

## **WCMD Environmental Justice Plan**

On February 11, 1994, President Clinton issued Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," ("Executive Order") that focused the attention of Federal agencies on the environmental and human health conditions of minority and low-income communities. The Executive Order directed Federal agencies to develop their own environmental justice strategies. WCMD examined a variety of goals and focused on two goals developed by the Agency-wide Environmental Justice Taskforce to ensure that:

- a.) no segment of the population, regardless of race, color, national origin, or income, as a result of EPA's policies, programs, and activities, suffers disproportionately from adverse human health or environmental effects, and all people live in clean and sustainable communities; and
- b.) those who must live with environmental decisions -- community residents, environmental groups, State, Tribal and local governments, businesses -- must have every opportunity for public participation in the making of those decisions. An informed and involved local community is a necessary and integral part of the process to protect the environment.

As part of WCMD's commitment to address environmental justice (EJ) and to provide meaningful public participation we would like to share our experiences and activities.

### **Environmental Justice in the FIFRA Program**

The FIFRA Worker Protection Standard (WPS), issued by the Agency in 1992, is a regulation designed to protect agricultural workers from occupational exposure to pesticides. During FY99 the Region will conduct an assessment of Worker Protection Standard implementation and enforcement throughout the Region 3 states. The information gathered as a result of the Region 3 WPS Assessment will, among other things, be evaluated to determine what environmental justice needs may exist within the agricultural worker community. Where environmental justice needs are identified, the Region, in consultation with its state partners, will pursue responsive remedies.

Region 3 Environmental Justice efforts in the realm of WPS aim to (1) enhance ongoing efforts to ensure that the worker community the standard is intended to safeguard is indeed protected; (2) promote worker knowledge of the protections extended by the standard; (3) seek alliances with traditional and non-traditional partners; and (4) ensure worker access to mechanisms and/ or information that afford relief when a lapse(s) in protection occurs.

### **Environmental Justice in the EPCRA, Lead and PCB Programs**

Community Right-to-Know and public education is a vital tool for families to make informed decisions concerning their environment and the potential health risks associated with a facility's toxic release. The EPCRA inspection targeting strategy includes a provision to utilize the Arcview software package to evaluate counties in Region III that contain areas with high EJ population densities. The

counties explored for EJ purposes are located in Pennsylvania counties: Erie, York, Delaware, Washington, Montgomery, and Lancaster. In keeping with the right-to-know, the expansion of facilities being subject to EPCRA, the EPCRA program has a web page, provide TRI Workshops, respond to public inquiries, and conduct compliance inspections and case development.

In Region III, 7.5 million housing units are estimated to contain some lead based paint (LBP). Of the 7.5 million units, 4.3 million units are considered “affordable,” and are potentially high risk. Affordable is referred to as housing units that are available for those with mid-to-low incomes. LBP is commonly found in housing that is in poor condition due to substantial deferred maintenance and has significant amount of interior LBP which results in higher prevalence of elevated blood lead levels in children of age 6 months to 6 years who live in urban, economically deprived neighborhoods. Childhood lead poisoning is a preventable disease. One way to effectively teach people how to maintain a healthy lifestyle is through community based activities and building partnerships with non-profit organizations. The central message is simple, Educate Teach Prevention and Test to fight against lead poisoning. Activities could include, but not limited to: Train the trainer, speaking engagements at fairs, schools and professional organizations, providing technical support, 1018 enforcement and 406 renovation and remodeling rule.

Although PCB equipment was banned in 1978, PCBs continue to persist in the environment. Since there is limited space in landfills and there are only a few incinerators which are permitted to burn items contaminated with PCBs, compliance monitoring and assistance is an integral part of the PCB program. The state and general public rely on EPA extensively for providing direction and recommendations to maintain compliance in the proper use and disposal of PCB equipment, and the implementation of the PCB amendments commonly known as the “Mega Rule.” The amendments cover all aspects of the PCB regulations that may be affected, from the registration of PCB equipment with EPA, to alternative disposal techniques and proper manifesting of PCB waste. The multimedia indexing system and the PCB equipment registration list will be utilized as a tool to identify vulnerable areas to target inspections and case development. PCB Workshops, Schools Initiative, Articles in Trade Journals, and dissemination of information are activities to educate everyone especially to those individuals that are most affected.

### **Environmental Justice in the and Public Participation in the RCRA program:**

Currently, within the RCRA program, Environmental Justice is considered during screening criteria for enforcement and permitting activity, however, the criteria for establishing a site as pertaining to environmental justice varies. The Region is currently developing GIS-based tools to implement standard criteria for environmental justice targeting and during the next year, will apply this component as part of the overall screening criteria for RCRA activities.

During the intervening time our granting authority continues to encourage states to engage in environmental justice screening. For example, the West Virginia State DEP hazardous waste program focused on the EJ community of Marrilla Park in Morgantown, WV, where six RCRA facilities were inspected. Three were hazardous waste handlers, two were non-handlers of hazardous waste, and one was a non-notifier who was handling hazardous waste. One violation noted in the inspections was the party that failed to notify as a handler. The facility was cited and has since come into compliance. The

state concluded that there was no disproportionately high incidence of adverse environmental or health impacts on this community from hazardous waste activities.

The Virginia UST program was provided grant funding to support 30 summer interns over a period of 5 years to considerably expand the number of inspections conducted at UST facilities from about 300 to nearly 5000. The state believes this kind of state-wide effort will enable them to embrace UST violations in EJ communities, as well as throughout the Commonwealth.

The Region III RCRA corrective action program is also addressing environmental justice issues at several sites, including federal facilities in the Anacostia area.

EPA Region 3 has entered into an Administrative Consent Order (ACO) with the Department of the Navy to investigate and remediate releases of PCBs, PAHs and heavy metals detected onsite and in the Anacostia river from the 66-acre Washington Navy Yard (WNY) in the District of Columbia. The project is being conducted under the authority of the Resource Conservation and Recovery Act (RCRA). The ACO combines the requirements of RCRA and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to develop remediation plans to address the contamination. The project includes coordination between both RCRA and CERCLA programs at EPA and the District of Columbia Environmental Regulatory Agency to provide Federal and State oversight of both regulatory requirements. The almost 200 year-old navy yard is within two miles of the White House and its remediation raises several environmental justice and other concerns from the substantially minority community within the surrounding area. The ACO requires that the Navy develop a community relations plan to which the Navy has responded by establishing the Restoration Advisory Board to address the substantial environmental justice community interests. The board meets monthly and provides a forum for the local citizens to participate in the investigation and remediation process. The Navy is reviewing its procedures to consider providing training and employment of local residents for the site-related cleanup activities. The project will assess the human health and ecological risks of the contaminants on the environment and the local community which has expressed its concerns for the releases of contaminants in its neighborhood.

The site has recently been added to the National Priority Listing (NPL) of sites for remediation under Superfund. As contemplated, The Region has begun negotiations with the Navy and D.C. authorities to transfer the project from the RCRA authority to a Superfund Interagency Agreement (IAG) for completion. By the year 2003, the Navy will transfer 4,500 jobs into the renovated navy yard under the Navy's Base Realignment and Closure program. The geographical area and its substantial minority population make the facility a part of both the EPA Region 3 Anacostia Initiative as well as the Environmental Justice Initiative.

EPA Region 3 is negotiating a RCRA 3013 order to investigate the releases of hazardous constituents at the 63 acre General Services Administration (GSA)/ Southeast Federal Center (SEFC) facility. Since 1963, the GSA has owned/operated its portion of the Washington Navy Yard, and, releases of PCBs, PAHs and heavy metals have been detected onsite. This project and the WNY project have similar contaminants and environmental justice concerns. Both the WNY and the SEFC projects will assess risks of the contaminants to the environment and the local community. The negotiations may conclude in the fall of 1998, and the Region hopes to issue the order by the second



quarter 1999. SEFC has already begun and continues to engage in investigation and remedial activities.

Allied Signal was an old chromium plant that has been demolished. Allied has installed a slurry wall, a new embankment, groundwater pump and treat system, and cap. When completed, there is a great potential for reuse in this urban area, providing an example of a RCRA Brownfields site. The remedy has resulted in a substantial reduction of chromium going into the Bay.

The Region engages the public in 100% of all remedy selections for permits and orders. In addition to the meetings required by statute, the Region holds informal public meetings during the investigation and cleanup process to enhance public participation and encourage informed and engaged stakeholders. Recently, Region III successfully completed a consent decree with Bethlehem Steel, MD and have begun implementation of the order. As part of that order Bethlehem Steel has consented to fund a \$50,000 grant to assist in technical evaluation of the investigation process. This effort will serve to raising awareness about the ongoing investigation and cleanup process. The consent decree also contains a section on mitigation of kish, an airborne, flaky carbon/metal mixture that results from cooling of molten metal. The community will likely participate in the development of this mitigation plan through the technical evaluation process funded by Bethlehem Steel.

Moreover, in response to community concerns raised during a public meeting, an air monitor was recently placed near a potential environmental justice area to monitor kish. This effort is independent of the kish mitigation plan and demonstrates the Region's responsiveness to the community.

## **CUSTOMER SERVICE PLAN**

### **WASTE AND CHEMICALS MANAGEMENT DIVISION**

**AUGUST, 15 1998**

Executive Order 12862 requires the Federal Government to provide service to the public that matches or exceeds the best service available in the private sector. The Waste and Chemical Management Division (WCMD) is committed to achieving this goal and has developed this customer service plan as a result.

#### **Current Customer Service Practices**

Below are some of the key customer service practices currently in place:

- WCMD has a public access area set aside as a place the general public can visit to read facility site records.
- Surveys of customers requesting information under the Freedom of Information Act have been conducted over the past three years. Surveys of participants in WCMD training programs and meetings have also been conducted.
- A 24 hour/day interactive voice response system has been set up for customers requesting verification of their EPA ID number via telephone.
- The WCMD Internet Web Page has been provided to allow customers to gain better access to a host of information including: organization structure, available EPA data, training opportunities, public hearing dates and locations, etc.
- Large volumes of hard copy files are being transformed to an electronic format to provide easy access to our customers
- The WCMD Communications Coordinator uses various techniques, e.g. press releases, information brochures, and radio shows, to reach out to the public and give them information about our programs.
- WCMD has provided substantial support to the national and region-wide efforts to improve customer service by becoming the expert in customer survey design, providing training at national workshops, providing assistance to other Divisions and major support in developing EPA's Customer Service approach.

In addition to the above activities, WCMD will develop a Division Customer Service Team consisting of representatives of each Branch to carry out the following activities as part of this Customer Service plan:

#### **A. Training**

All Division employees will take the "Forging the Links" training. Three of the division employees have been trained as trainers to conduct this training. The first training session in the Region was held by WCMD on June 30, 1998. We plan to hold one or two training sessions each quarter over the course of the next 15 months to train the rest of the Division's employees.

## **B. Assessment of Customer's Satisfaction**

The WCMD will identify its key customers for each Branch and collect feedback from those customers on how the Division can improve its services. It is envisioned that a combination of written surveys, focus groups, telephone surveys, meetings and day to day contact will be used to collect the customer feedback.

During the past few months, WCMD has provided consulting services to the HSCD on a customer service assessment pilot initiated as a result of customer service efforts begun before the Division was reorganized. The targeted customer service group are the people who report spills to EPA's Superfund emergency response center. A team of employees and managers have worked to develop a questionnaire for a targeted group of customers by applying skills gained through customer service training. The survey instrument is currently being processed through Headquarters to receive OMB clearance. Results of this effort will be useful to the Region for future survey efforts.

WCMD will be conducting similar efforts with the objective of improving customer service over the course of the next 15 months.

## **C. Identify Employees Having Key Customer Contact**

Over the next six months each Branch in the Division will review its employees' responsibilities and identify those having contact with our key customers. We will then evaluate their performance standards to ensure that they reflect the need to provide excellent customer service.

## **D. Application of Agency-wide Customer Service Standards**

We have reviewed the Agency-wide customer service standards and aside from the Universal Customer Service Standards the WCMD has identified the following additional standards as being related to the Division's work: (1) Public Access; (2) Partnership Program; (3) State and Local Program Grants; (4) Pesticide Registration; (5) Permitting; and (6) Enforcement Inspections and Compliance Assistance. During the next 8 months the Division will closely evaluate each of the standards, determine their applicability, and develop a plan for implementing necessary process changes to achieve compliance with all standards.

## **E. Public Access to Data and Decision Making**

As discussed above, the Division has taken important steps to make information including data available to the public. We provide a public access room for people to review files, as well as maintaining a public docket of information in a local library near hazardous waste sites undergoing cleanup. We publish proposed plans which describe in layman's terms the cleanup to be undertaken. We provide fact sheets and risk assessment information and data on the Division's home page. We are forming a steering committee which will work continually on developing and maintaining improvements to our Division's home page. The steering committee will have representation from the

Division office as well as each of our Branches. We anticipate the first meeting of this steering committee to take place in the next 30 days.

### **WCMD Customer Service Plan Schedule**

| <u>Task</u>  | <u>Time</u>          |
|--|----------------------|
| “Forging the Links” Training for all employees                                     | July 1998-Oct. 1999  |
| Branch Projects for Customer Assessment  | Sept. 1998-Oct. 1999 |
| Identify Employees having Key Customer Contact                                     | Dec. 1998            |
| Implement Customer Service Performance Standards                                   | Jan. 1999            |
| Plan for Addressing Applicable Agency-wide Standards                               | March 1999           |
| Implement Division Steering Committee for Continuous Upgrade of Internet Home Page | Oct. 1998            |

### **Training**

(1) Forging the Links training will be given to all Division employees by the end of March, 1999.

Purpose of training:

- Awareness of importance of Customer Service - emphasize McCabe's four memo's over past 2 years. We have been directed to carry out - the big five: (1) provide frequent and consistent ques on the value of customer service; (2) build customer service into accountability and recognition; (3) provide CS orientation training to all employees and specialized training key CS staff; (4) perform base line satisfaction assessment in order to (a) improve CS from customers perspective and (b) keep track of how well you are serving customers over time (trends) and (5) improve public access to EPA information (environmental and enforcement)

- Understand why we need customer feedback and how we will go about obtaining it.

- Learn about what is expected of each employee

- List of expectations in course - return calls within 24 hours; return correspondence within 10 days; courteous, polite interactions; etc.

- Describe WCMD's plan.

(2) Specialized training will be developed for all key customer contact staff

- secretaries

- FOIA

- inspectors

- RPMs

## **Assessment of Customer Satisfaction**

5 steps

Plan the customer feedback effort

Construct the data collection process and procedures

Conduct data collection

Analyze the data

Implement any changes necessary to improve customer satisfaction

## **Plan for Customer Feedback**

- Get Ready

Key questions -

Is our organization ready for customer feedback?

Do employees understand why we need feedback?

Do employees and managers sincerely intend to pay attention to feedback and act on results?

Have supervisors and employees directly participated in defining approach, information needed, concerns and objectives in obtaining customer feedback?

Have we identified barriers such as concerns about extra work, change, adverse findings associated with customer feedback? Have we identified methods to overcome barriers.

- define customers

- identify services supplied to customers

establish purposes of customer feedback

determine if customer feedback information already exists

develop written plan

## **Construct the Data Collection Procedures**

choose an approach

design the sample

decide methods for collecting data

develop the questions

construct the questionnaire

pretest

prepare OMB clearance package

EPA guidelines will spell out approach.